

James R. Condo (#005867)
Amanda C. Sheridan (#027360)
SNELL & WILMER L.L.P.
One Arizona Center
400 E. Van Buren, Suite 1900
Phoenix, Arizona 85004-2202
Telephone: 602.382.6000
Facsimile: 602.382.6070
jcondo@swlaw.com
asheridan@swlaw.com

Richard B. North, Jr. (admitted *pro hac vice*)
Georgia Bar No. 545599
Matthew B. Lerner (admitted *pro hac vice*)
Georgia Bar No. 446986
NELSON MULLINS RILEY & SCARBOROUGH LLP
201 17th Street, NW / Suite 1700
Atlanta, GA 30363
Telephone: (404) 322-6000
Telephone: (602) 382-6000
richard.north@nelsonmullins.com
matthew.lerner@nelsonmullins.com

Attorneys for Defendants C. R. Bard, Inc. and
Bard Peripheral Vascular, Inc.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

IN RE: Bard IVC Filters Products Liability
Litigation,

No. 2:15-MD-02641-DGC

**NOTICE OF SUBMISSION OF
SECOND AMENDED CASE
MANAGEMENT ORDER NO. 4
RE: MASTER COMPLAINT,
MASTER RESPONSIVE
PLEADING, USE OF SHORT FORM
COMPLAINT, WAIVER OF
SERVICE FOR BARD
DEFENDANTS, AND ANSWER AND
GENERAL DENIAL IN CASES
SUBSEQUENTLY TRANSFERRED
TO MDL 2641**

Defendants C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. (collectively
“Bard”) submit a proposed form of Second Amended Case Management Order No. 4, to
address the Master Complaint, Master Responsive Pleading, use of Short Form
Complaint, waiver of service for Bard Defendants, and answer and general denial in cases

1 subsequently transferred to MDL 2641. The purpose of the proposed amendment is to
 2 correct an error in the Short Form Complaint and Amended Short Form Complaint;
 3 specifically, the Short Form Complaint and Amended Short Form Complaint mistakenly
 4 classify the G2® Express and G2® X Vena Cava Filters as synonymous when in fact they
 5 are separate and distinct models. The form of order and attached Second Amended Short
 6 Form Complaint are agreed and stipulated to by the parties.

7 This 15th day of April, 2016.

8 s/Richard B. North, Jr.
 9 Richard B. North, Jr.
 Georgia Bar No. 545599
 Matthew B. Lerner
 Georgia Bar No. 446986
 NELSON MULLINS RILEY & SCARBOROUGH, LLP
 Atlantic Station
 201 17th Street, NW / Suite 1700
 Atlanta, GA 30363
 PH: (404) 322-6000
 FX: (404) 322-6050
 Richard.North@nelsonmullins.com

15 James R. Condo (#005867)
 Amanda Sheridan (#005867)
 SNELL & WILMER L.L.P.
 One Arizona Center
 400 E. Van Buren
 Phoenix, AZ 85004-2204
 PH: (602) 382-6000
 JCondo@swlaw.com
 ASheridan@swlaw.com

20 **Attorney for Defendants C. R. Bard, Inc. and**
Bard Peripheral Vascular, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on April 15, 2016, the foregoing was electronically filed with the Clerk of Court using the CM/ECF system which will automatically send e-mail notification of such filing to all attorneys of record.

s/Richard B. North, Jr.
Richard B. North, Jr.
Georgia Bar No. 545599
Matthew B. Lerner
Georgia Bar No. 446986
NELSON MULLINS RILEY & SCARBOROUGH, LLP
Atlantic Station
201 17th Street, NW / Suite 1700
Atlanta, GA 30363
PH: (404) 322-6000
FX: (404) 322-6050
Richard.North@nelsonmullins.com

Nelson Mullins Riley & Scarborough

LLP
201 17th Street NW, Suite 1700
Atlanta, GA 30363
(404) 322-6000